

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARANDA LYNN ODONNELL, *et al.*

Plaintiffs

vs.

HARRIS COUNTY, TEXAS, *et al.*,

Defendants.

CIVIL ACTION NO. 4:16-CV-1414

**Motion for Leave to File Brief Amicus Curiae and Brief of Amicus Curiae
Harris County Precinct 3 Commissioner Steve Radack**

Commissioner Steve Radack, 1001 Preston Street, Houston, Texas 77002, (713) 755-6306, Amicus Curiae

Fred A. Keys, Jr., P.O. Box 854, 5 Rattlesnake Court, Sonoita, Arizona, (713) 880-8805, Counsel for Amicus Curiae

Motion for Leave to File Brief Amicus Curiae

Commissioner Radack has invested most of his life serving the people of Houston and Harris County. He served eleven years at the Houston Police Department, leaving as a Sergeant. He was elected Precinct 5 Constable and served there for four years. For the past thirty years he has served as Harris County Precinct 3 Commissioner. He respectfully moves for leave to file the attached brief amicus curiae in this case.

Commissioner Radack is not supporting the position of either of the litigants in their proposed Consent Decree. The consent of the plaintiffs to file this motion has been obtained and they are not opposed. The consent of the defendants has been obtained and they are not opposed.

Accordingly, Commissioner Radack respectfully requests that the Court grant his motion for leave to file the accompanying brief and consider his arguments during its deliberations.

Respectfully submitted,

s/ *Fred A. Keys, Jr.*

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Certificate of Service

I certify that on August 22, 2019, a true and correct copy of this Motion for Leave to File Amicus Brief was served by electronic notice to all parties of record.

/s/ *Fred A. Keys, Jr.*
FRED A. KEYS, JR.